

**DEPARTMENT OF THE TREASURY
FEDERAL LAW ENFORCEMENT TRAINING CENTER
OFFICE OF TRAINING**

FINANCIAL FRAUD INSTITUTE



SYLLABUS

**INTERNATIONAL BANKING AND MONEY
LAUNDERING TRAINING PROGRAM
(IBMLTP)AUGUST 2002**

International Banking and Money Laundering Training Program - IBMLTP - Syllabus

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History and Purpose of the Program

In response to trends and developments within the area of international banking procedures and money laundering, the National Drug Policy Board's Financial Enforcement Committee established a task force to develop an international banking training program for intelligence analysts. The task force was comprised of individuals from the law enforcement, intelligence and banking communities, as well as the Police Executive Research Forum.

The mission of the task force was to establish a training program for Federal law enforcement criminal investigators and intelligence analysts which would allow these individuals, as a part of their financial intelligence role, to interpret international money laundering and cash flow information. As a result of their efforts, the task force succeeded in developing a one-week training program, the International Banking and Money Laundering Training Program (IBMLTP). The program aims to enhance the capabilities of those individuals who handle financial information, particularly when the information relates to foreign financial institutions and/or money laundering. On September 18, 1989, the task force issued their final report as well as their recommended curriculum for the new training program.

In March 1990, the Federal Law Enforcement Training Center (FLETC) was designated the sponsor of the new training program. The Financial Fraud Institute (FFI), a division of the FLETC, was selected to provide all program coordination, scheduling, management and administrative requirements for the program. In October 1990, the pilot of IBMLTP was held, and in 1994 a Curriculum Review Conference took place to further refine the program. The current program is the result of those efforts.

The IBMLTP was initially designed for those students who are already trained in the methods of law enforcement intelligence analysis and who have prior experience working in that capacity. Keeping in mind that the subject matter of the program focuses primarily on the area of foreign banking, the ultimate objective of the program is to provide additional skills and techniques for analysts. Although originally developed for intelligence analysts, the FLETC has responded to the requests of its client agencies by recently expanding the program and making it available to criminal investigators.

The need for such an inter-agency and inter-disciplinary training program is now well documented and the FLETC is proud to be the sponsor of this important training initiative. As the scope and impact of large scale international crimes continue to grow. The IBMLTP will remain a viable and effective training program, responding to the evolving needs of the law enforcement community.

Program Administration

Applicants should contact the Federal Law Enforcement Training Center, (FLETC) Training Analysis and Coordination Division (TAC) at (912) 267-2421 for enrollment information. Upon acceptance into a program, a confirmation letter with details on housing, transportation, and schedules will be mailed to the participant.

All training participants will report to the assigned classroom by 7:30 a.m. on the first day of training and should check in at the FLETC registration office the previous evening. The FLETC reserves the right to deny participation to anyone with an unexcused late arrival. Student attendance is required on graduation day to receive a certificate of training for any FFI advanced training program.

Length of Program

The training program is 1-week in duration and has a total of 37 course hours.

On the last day of scheduled training, the training program will conclude at approximately 11:30 a.m. Due to FLETC transportation requirements, no airline departure should be scheduled earlier than 2:00 p.m. The FLETC reserves the right to deny graduation from the training program for any student departing from the training program early.

Standard Daily Schedule

Morning Session(s)	7:30 a.m. to 11:30 a.m.
Lunch Session	11:30 a.m. to 12:30 p.m.
Afternoon Session(s)	12:30 p.m. to 4:30 p.m.

Program Cost

Participants are responsible for their own transportation expenses to the FLETC. Since costs vary from year to year, the participation fees are not published in this document, but can be obtained from the FLETC, Training Analysis and Coordination Division at (912) 267-2421.

The following program costs are intended for general informational purposes only and may vary depending on a number of conditions. For current and accurate program costs contact the sources listed under chapter "Additional Information". Fees cover all costs including room, board, most materials and supplies.

Program Tuition:	\$469.88
Meals/Lodging/Miscellaneous:	\$153.80
Total Estimated Cost:	\$628.18

Location

All training is conducted at the FLETC, Glynco, Georgia, an interagency training facility located 6 miles north of Brunswick, Georgia and approximately 75 miles equidistant between Savannah, Georgia and Jacksonville, Florida. It is located near the beach resorts of St. Simons Island, Sea Island and Jekyll Island, Georgia. The climate is moderate and lends itself to year-round outdoor training.

Qualification for Attendance

The Center's Board of Directors has determined that the training program is available to Federal organizations actively involved in investigating and prosecuting crimes that involve international banking and money laundering. State and local agency personnel are eligible to attend on a space-available basis upon sponsorship of a Center participating organization.

Student Evaluation

There will be a graded examination at the end of the program. The examination will consist of 25 questions in multiple choice and true or false format. Seventy percent accuracy is required to receive a Certificate of Attendance upon completion of the program.

ADDITIONAL INFORMATION

Additional information concerning the International Banking and Money Laundering Training Program may be obtained by contacting:

Federal Applicants:

IBMLTP Coordinator: Bill Wuerth
Federal Law Enforcement Training Center
Financial Fraud Institute
Glynco, Georgia 31524
(912) 267-2747
(912) 267-2500 (FAX)
bwuerth@fletc.treas.gov

State/Local Applicants:

Director
Federal Law Enforcement Training Center
Office of State/Local Training
Glynco, Georgia 31524
(912) 267-2345 or
(800) 743-5382

Program Summary

Responsibility for the supervision and delivery of course material to students at the Federal Law Enforcement Training Center rests with the Office of Special Training (OST) which is responsible for overall program development and oversight, as well as course development and delivery. The OST is comprised of four instructional divisions as follows: Financial Fraud Institute, Driver and Marine, Physical Techniques, and Firearms.

In the IBMLTP, course instruction is a multi-agency responsibility. Instructors for the program are from the FLETC and several of the participating organizations. Guest instructors from Federal organizations outside of the FLETC are also used to augment the Center instructors. These organizations are: Comptroller of the Currency, Department of Justice (Office of International Affairs), Federal Reserve Board, Financial Crimes Enforcement Network, Federal Bureau of Investigation and INTERPOL.

The course descriptions and objectives listed herein are presented in this format: course title, section, length and method of presentation, description and objectives. The length of the courses is presented in hour and minute notations. The primary methods of presentation are listed with the following formats:

LECTURE/CLASSROOM- A training situation, indoors or outdoors, in which instructional material is being presented by an instructor.

LABORATORY- A training situation, indoors or outdoors, in which students are practicing skills under guidance of an instructor(s).

PRACTICAL EXERCISE- A training situation, indoors or outdoors, in which students, under supervision/evaluation of an instructor(s), are participating in a law enforcement related scenario or performing a law enforcement related skill which will be graded.

Standards of Training:

To successfully fulfill the requirements of the program and receive a Certificate of Training, the student shall attend all class sessions and is expected to:

- a. Trace funds from various financial records and/or institutions to source documents or vice versa;
- b. Discuss and give illustrations of the two types of transactions and how documents flow into, through, and out of U. S. Banks in the international banking environment;
- c. Define the Bank Secrecy Act and be knowledgeable of the criminal and civil penalties that may be imposed under it;
- d. Describe the basic elements of each of the major statutes used in the investigation and prosecution of money laundering violations;
- e. List what assets are forfeitable under the law and the asset sharing provision of the law;
- f. Identify what regulations and treaties are in effect between the U. S. and foreign countries and how information may be obtained from foreign countries;
- g. Describe the primary federal and commercial databases the Financial Crimes Enforcement Network (FinCEN) has access to and how FinCEN can assist with an investigation;
- h. Apply money laundering investigative techniques to non-drug, white collar crime investigations and determine if potential money laundering violations have been committed;
- i. Identify the function of the Office of Foreign Asset Control within the Department of Treasury;
- j. Describe how individuals use offshore havens to facilitate money laundering;
- k. Recognize how money laundering operates in different areas of the U.S. and in foreign countries; and
- l. Participate in classroom discussions and practical exercises involving application

of the theories and methods presented.

Remediation:

Students are not placed on academic probation. Students will be afforded opportunities for remediation when such remediation does not place an undue burden on staff or resources. A student who is unable to demonstrate a working knowledge and ability to apply the information presented during training, will not receive a Certificate of Training.

PROGRAM OF INSTRUCTION

**INTERNATIONAL BANKING AND MONEY LAUNDERING
TRAINING PROGRAM - IBMLTP**

COURSE TITLE: MONEY LAUNDERING STATUTES**LENGTH AND METHOD OF PRESENTATION:**

<u>LECTURE</u>	<u>LABORATORY</u>	<u>PRACTICAL EXERCISE</u>	<u>TOTAL</u>
5:00			5:00

DESCRIPTION:

This course of instruction gives the student the civil and criminal provisions of the money laundering laws, specifically Title 18, 1956/1957 and Title 31. It covers financial transaction offenses, international transportation offenses, “sting” offenses, and monetary transaction offenses. It covers the elements of each offense and the legislative intent of the law. Additionally, investigative and prosecutorial methods will be discussed as well as their impact within the U.S. Judicial system.

TERMINAL PERFORMANCE OBJECTIVES:

The student will have a fundamental understanding of the basic elements of each of the major statutes used in the investigation/prosecution of money laundering violations. They will be able to determine which of the four criminal offenses is best suited for potential money laundering prosecutions.

INTERIM PERFORMANCE OBJECTIVES:

1. Define the elements of financial transaction offenses, international transportation offenses, “sting” offenses, and monetary transaction offenses.
2. Define the specific terms: financial transaction, specified unlawful activity, monetary transaction, criminally derived property and financial institution.

METHOD OF EVALUATION: Completion of course.

COURSE TITLE: BANK SECRECY ACT

LENGTH AND METHOD OF PRESENTATION:

<u>LECTURE</u>	<u>LABORATORY</u>	<u>PRACTICAL EXERCISES</u>	<u>TOTAL</u>
2:00			2:00

DESCRIPTION:

This course of instruction gives the student the practical application of the Bank Secrecy Act (BSA) against the professional money launderers that support organized criminal activity, such as drug trafficking. The BSA truly is a “tool” to be used against the illegal activities of narcotics traffickers, money launderers, and tax evaders.

TERMINAL PERFORMANCE OBJECTIVES:

The student will have a fundamental understanding of the basic elements of the BSA and the regulations requiring the filing of reports, as well as the maintenance of records, that are determined to have a high degree of usefulness in criminal , tax and regulatory investigations or proceedings.

INTERIM PERFORMANCE OBJECTIVES:

1. Identify the responsibilities of the Office of Financial Enforcement with regard to BSA regulations.
2. Identify the four BSA reports that are required to be filed.
3. Identify the other types of reporting forms that the Act requires financial institutions to maintain.
4. Define the term “structuring”.
5. Identify the penalties that can be imposed under the Act.

METHOD OF EVALUATION: Completion of course.

COURSE: ASSET FORFEITURE

LENGTH AND METHOD OF PRESENTATION:

<u>LECTURE</u>	<u>LABORATORY</u>	<u>PRACTICAL EXERCISE</u>	<u>TOTAL</u>
2:00			2:00

DESCRIPTION:

This course is designed to introduce the student to the concepts of asset forfeiture. It will focus on the mechanics of asset forfeiture, its provisions and options, and relevant statutes. Emphasis will be on how the money laundering statutes may be used in money laundering investigations.

TERMINAL PERFORMANCE OBJECTIVE:

At the conclusion of this course the student will be able to determine if assets are in fact forfeitable, when presented with various money laundering scenarios.

INTERIM PERFORMANCE OBJECTIVES:

1. The student will identify the various types of asset forfeiture and the factors that determine which type of forfeiture can be used.
2. The student will identify the three categories of property which is “involved” in a crime.
3. The student will identify the standard of proof necessary to seize assets and determine if that standard has been met in a specific case study.
4. The student will list the five requirements a person must prove to win an “innocent owner” defense motion.

METHOD OF EVALUATION: Completion of course.

COURSE TITLE: DOMESTIC AND INTERNATIONAL MONEY MOVEMENT**LENGTH OF PRESENTATION:**

<u>LECTURE</u>	<u>LABORATORY</u>	<u>PRACTICAL EXERCISE</u>	<u>TOTAL</u>
4:00			4:00

DESCRIPTION:

This course of instruction gives the student a fundamental understanding of the international banking structure. To provide this understanding, the course focuses first on checks and electronic payments then wire transfers such as FEDWIRE, CHIPS, SWIFT and other transfer media. The focus then shifts to the international banking framework and the role of the Federal Reserve with that system, discussing such items as international services provided by U.S. banks and products provided by U.S. banks for their international operations. The course of instruction also deals extensively with “Know Your Customer” and Internal Compliance and provides the student instruction on how to identify abuses within the banking structure.

TERMINAL PERFORMANCE OBJECTIVE:

At the conclusion of this course the student will be able to describe how funds are transferred internationally, describe the characteristics of the system used to effect the transfers, and list compliance and control methods used and opportunities that may exist for abuses to occur.

INTERIM PERFORMANCE OBJECTIVES:

1. Describe the framework of the international banking system including international services performed by U.S. banks and the role of the U.S. Federal Reserve in the international system.
2. List the various electronic and wire transfer systems and how these systems are used to transfer funds.
3. Describe the internal compliance methods within the international banking system and methods that might be used to identify abuses within the system.

METHOD OF EVALUATION: Completion of course.

COURSE TITLE: REGULATION AND TREATIES**LENGTH OF PRESENTATION:**

<u>LECTURE</u>	<u>LABORATORY</u>	<u>PRACTICAL EXERCISE</u>	<u>TOTAL</u>
2:00			2:00

DESCRIPTION:

This course introduces students to formal evidence-gathering under U.S. law for foreign prosecutors and investigators. The Office of International Affairs (OIA) within the U.S. Department of Justice, Criminal Division, is the "Central Authority" for facilitating requests for assistance under Mutual Legal Assistance Treaties (MLATs). OIA also handles requests for assistance in criminal matters submitted from foreign countries with which we do not have a formal MLAT.

TERMINAL PERFORMANCE OBJECTIVES:

At the conclusion of this course the student will be able to deal effectively with a request from a foreign government for legal assistance.

INTERIM PERFORMANCE OBJECTIVES:

1. Discuss how incoming requests for legal assistance from foreign authorities are handled.
2. Discuss the procedures for evidence gathering, executing search warrants, wiretap cooperation and transfer of prisoners for testimony in accordance with foreign instructions.
3. Describe forfeiture of criminal proceeds and asset sharing in working with foreign governments.
4. Discuss the required contents of a foreign request for legal assistance.

METHOD OF EVALUATION: Completion of course.

COURSE TITLE: CONCEALED INCOME ANALYSIS**LENGTH OF PRESENTATION:**

<u>LECTURE</u>	<u>LABORATORY</u>	<u>PRACTICAL EXERCISE</u>	<u>TOTAL</u>
2:00		1:00	3:00

DESCRIPTION:

This course of instruction is designed to provide the investigator with existing and new techniques in analyzing and compiling financial records to determine the extent of illegal or concealed income. With emphasis on how the criminal element can launder his/her income in order to conceal the real source of the funds. The course of instruction will utilize two methods of financial analysis to assist the investigator in formulating leads and eventually to use this information as evidence.

TERMINAL PERFORMANCE OBJECTIVE:

At the conclusion of the course the student will be able to describe the categories that must be analyzed to properly prepare a net worth and source and application of funds methods of proof. Further, the student, using the categories discussed above, will be able to evaluate asset acquisition and disposition, debt acquisition and liability payments, the sources of funds and their uses, in order to accurately determine the suspects concealed income.

INTERIM PERFORMANCE OBJECTIVES:

1. Describe the categories of financial accounts that must be examined to determine concealed income under the two methods of proof.
2. Describe the type of transactions to be evaluated in preparation of a net worth statement to determine an increase (or decrease) in net worth and concealed income (if any).
3. Describe the type of transactions to be evaluated in preparation of the source and application of funds.

METHOD OF EVALUATION: Demonstrated proficiency in the two practical exercises contained in the course materials.

COURSE TITLE: CANADIAN MONEY LAUNDERING**LENGTH OF PRESENTATION:**

<u>LECTURE</u>	<u>LABORATORY</u>	<u>PRACTICAL EXERCISE</u>	<u>TOTAL</u>
2:00			2:00

DESCRIPTION:

In order to be effective in combating Money Laundering, the agent needs to be familiar with the status of statutory and prosecutorial processes of Money Laundering of our Canadian friends.

TERMINAL PERFORMANCE OBJECTIVE:

At the conclusion of this course, the student will be able to identify and discuss Canadian Money Laundering.

INTERIM PERFORMANCE OBJECTIVE:

1. Discuss key typologies of money laundering cases in Canada.
2. Identify Canadian Government, police, judicial, financial and corporate structures and procedures to assist an attendee in undertaking an investigation with a Canadian nexus.
3. Discuss Canada's anti-money laundering legislation.
4. Discuss the history and development of money laundering and organized crime in Canada.

METHOD OF EVALUATION: Completion of Course.

COURSE TITLE: MONEY LAUNDERING AND TERRORISM**LENGTH OF PRESENTATION:**

<u>LECTURE</u>	<u>LABORATORY</u>	<u>PRACTICAL EXERCISE</u>	<u>TOTAL</u>
2:00			2:00

DESCRIPTION:

This course will associate the terrorist activities which now predominate the news with the life-blood of those activities, that of the funding of them. Since 9/11/01 countering terrorism has become a passion of many police forces. This course will facilitate the investigating and prosecuting of the funding of terrorist activities.

TERMINAL PERFORMANCE OBJECTIVE:

Upon completion of this training the student will apply the key provisions of Title III of the USA Patriot Act. This law became effective October 26, 2001.

INTERIM PERFORMANCE OBJECTIVES:

1. Identify the methods used by terrorist groups to finance their activities;
2. Examine the similarities and differences between money laundering activities as they relate to criminal activities and terrorist activities;
3. Identify the of key provisions of the Title III of the USA Patriot Act, which the President signed into law on October 26, 2001;
4. Develop an understanding of new recommendations and initiatives by the Financial Action Task Force and other Allies to combat the financing of terrorism; and
5. Identify the activities undertaken since September 11, 2001, to combat the financing of terrorism.

METHOD OF EVALUATION: Completion of Course.

COURSE TITLE: INTERNATIONAL MONEY LAUNDERING HAVENS**LENGTH AND METHOD OF PRESENTATION:**

<u>LECTURE</u>	<u>LABORATORY</u>	<u>PRACTICAL EXERCISE</u>	<u>TOTAL</u>
4:00			4:00

DESCRIPTION:

This course is designed to give students a basic understanding of the reasons for use and methods employed by individuals who use offshore international money laundering havens to facilitate money laundering. Additionally, the course will provide suggested steps and approaches in overcoming problems generated by their use.

TERMINAL PERFORMANCE OBJECTIVE:

The student will be able to identify the characteristics and reasons for using offshore trusts/tax havens, as well as be able to identify the major off shore trusts/tax havens and financial secrecy jurisdictions.

INTERIM PERFORMANCE OBJECTIVES:

1. Identify the common methods used by individuals to facilitate money laundering through offshore trusts/tax havens.
2. Identify the types of business entities established off-shore, that individuals use to facilitate money laundering.
3. Identify several methods used to develop cases on individuals using offshore trusts/tax havens.

METHOD OF EVALUATION: Completion of course.

COURSE TITLE: METHODS/TECHNIQUES OF MONEY LAUNDERING**LENGTH AND METHOD OF PRESENTATION:**

<u>LECTURE</u>	<u>LABORATORY</u>	<u>PRACTICAL EXERCISE</u>	<u>TOTAL</u>
5:00			5:00

DESCRIPTION:

This course focuses on jurisdiction within Title 18-1956 and 1957 covering specified unlawful activities for Federal and state crimes in money laundering. The course covers methods and techniques used by criminal investigators in investigating money laundering crimes and how the agent/prosecutor can use these violations in money laundering cases. Case scenarios are used to highlight how money laundering charges can be used in a variety of investigations.

TERMINAL PERFORMANCE OBJECTIVE:

Students will be able to apply money laundering investigative techniques to financial investigations. Students will be able to recognize the specified unlawful activities that trigger potential money laundering violations. Given specific case scenarios the student will be able to determine if potential money laundering violations have been committed.

INTERIM PERFORMANCE OBJECTIVES:

1. Describe the common misconceptions about money laundering.
2. Describe the statutory and regulatory sources governing currency reporting requirements.
3. Describe the required currency reports to be filed.
4. Define the jurisdictional responsibility of the criminal investigator in the examination and prosecution of money laundering cases.
5. Given a money laundering case scenario, best describe the investigative steps a criminal investigator should take to determine if money laundering violations have been committed.

METHOD OF EVALUATION: Completion of course.

COURSE TITLE: MONEY LAUNDERING APPLICATION LABORATORY**LENGTH AND METHOD OF PRESENTATION:**

<u>LECTURE</u>	<u>LABORATORY</u>	<u>PRACTICAL EXERCISE</u>	<u>TOTAL</u>
	2:00		2:00

DESCRIPTION:

The Practical Exercise is designed to place the student in the role of a money launderer and to use the methods and techniques delineated in the program to best launder his/her ill-gotten gains. Students will be divided into teams in order to facilitate the practical exercise. Each team will then present their money laundering scheme to the class. The class will then be asked what investigative steps they would take to uncover the money laundering scheme as presented.

TERMINAL PERFORMANCE OBJECTIVE:

Given a case scenario the student teams will develop and present a money laundering scheme. After presentation of the scheme the remainder of the class will then discuss what investigative steps they would take to uncover the money laundering scheme as presented.

INTERIM PERFORMANCE OBJECTIVES:

1. Given a case scenario develop and present a money laundering scheme.
2. As a class, discuss what investigative steps could be taken to uncover the money laundering scheme as presented.

METHOD OF EVALUATION: Completion of Course.

SYNOPSIS OF COURSES
COURSE HOURS OF INSTRUCTION

Course	Lec.	Lab	P.E.	Total
Money Laundering Statutes	5:00			5:00
Bank Secrecy Act	2:00	:00	:00	2:00
Asset Forfeiture	2:00	:00	:00	2:00
Domestic & International Money Movement	4:00	:00	:00	4:00
Regulations & Treaties	2:00	:00	:00	2:00
Concealed Income Analysis	2:00	:00	1:00	3:00
Canadian Money Laundering	2:00	:00	:00	2:00
Money Laundering & Terrorism	2:00	:00	:00	2:00
International Money Laundering Havens	4:00	:00	:00	4:00
Methods & Techniques of Money Laundering	5:00	:00	:00	5:00
Money Laundering Application Laboratory	:00	2:00	:00	2:00
SUBTOTAL	30:00	2:00	1:00	33:00

ADMINISTRATIVE TIME:	
Introduction/Orientation	1:00
Graduation/Critiques	1:00
SUBTOTAL	2:00
TOTAL PROGRAM LENGTH:	
Lecture	30:00
Laboratory	2:00
Practical Exercise	1:00
Administrative	2:00
Total Program Hours	35:00

SAMPLE PROGRAM SCEDULE

FEDERAL LAW ENFORCEMENT TRAINING CENTER
INTERNATIONAL BANKING/MONEY LAUNDERING TRAINING PROGRAM

MASTER SCHEDULE

Room:	Day 1	Day 2	Day 3	Day 4	Coordinator: Mr. Klonoski Day 5
7:30 - 8:30	Welcome/Orientation <i>FFI Staff</i>	Bank Secrecy Act (3188.0)	Canadian Money Laundering (3179.02)	International Money Laundering Havens (3191.04)	Money Laundering Applications Laboratory (3075.02)
8:30 - 9:30	Money Laundering Statutes (3285.05)	<i>Guest/FinCEN</i>	<i>Guest</i>		
9:30 - 10:30		Regulations and Treaties (3190.02)	Money Laundering and Terrorism (3785.02)		<i>FFI Staff</i>
10:30 - 11:30	<i>Guest/AUSA</i>	<i>Guest/DOJ</i>	<i>FFI Staff</i>	<i>Guest/IRS-Int'l</i>	Closure/Graduation <i>FFI Staff</i>
11:30 - 12:30	#####	#####	#####	#####	#####
12:30 - 1:30	Money Laundering Statute (3285.05)	Domestic and International Money Movement (3178.0)	Methods and Techniques of Money Laundering (3240.0)	Methods and Techniques of Money Laundering (3240.05) <i>Guest/IRS-CID</i>	
1:30 - 2:30	<i>Guest/AUSA</i>			Concealed Income Analysis (3062.03)	
2:30 - 3:30	Asset Forfeiture (3480.02)				
3:30 - 4:30	<i>Guest</i>	<i>Guest/FedReserve</i>	<i>Guest/IRS-CID</i>	<i>FFI Staff</i>	

Revised: March 2002
Sup. Cert. Correct: 3/12/02